REMARKS

Claims 1-7 and 10-29 are pending in this application.

Claims 8 and 9 had been previously canceled.

Claims 1, 10, 15, and 20-29 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,911,776 to Guck, herein after "Guck," in view of U.S. Patent No. 6,629,130 to Mertama, herein after "Martama."

Claims 1, 10, 15, 20, 21, 23, and 25 through 29 are independent claims having the common feature of employing an **unformatted plain text message**.

For example, claim 1 provides a method for composing a computer message. The method includes presenting a message composition area for entry of an **unformatted** message into at least one text field and for entry of data into at least one selection field associated with the text field, and a message format selector for selecting an output format from a plurality of formats. The method also includes, in response to entry of an **unformatted** message into the message composition area and selection of one of the output formats, **converting the unformatted message to form a formatted message** from the text field with **format tags**. The formatted message is formatted according to the one of the output formats. Format tags are assigned to the formatted message and the formatted message is structured for display based on a selection field data from the at least one associated selection field.

The Final Office Action states that an author Guck teaches that "an author could originate a text message of his own personal format."

Further, the Final Office Action states that Guck teaches composing a computer message "comprising the steps of: (a) presenting a message composition area for entry of an unformatted into one text field..."

Still further, the Final Office Action states that Guck "teaches an author can create its own message or document in his own format such as Rich Text Format (RTF) (unformatted);"

All three statements above of the Final Office Action are incorrect statements because the Final Office Action incorrectly states that a message in a particular format chosen by an author is an unformatted message.

Thus, the only place Guck uses the expression "his own personal format" is in the following paragraph.

> "It would be most desirable to provide a network where any client, no matter what format his document consists of, or what his personal computer protocol system utilizes, could create, originate or author a document and enable this document's content to be transmitted to and received by personal computer clients or appliances using different types of protocol so as to be received by appliances such as FAX machines, telephones and E-Mail users. Heretofore, this has not been done with any great efficiency whereby an originator or author could originate a text or message in his own personal format and using his personal appliance protocol, and send it to multiple receiver users and multiple receiver appliances without any further complications other than sending his text or message into the network after it has been automatically processed and handled by a server which distributes his origination in any and all formats

> necessary to be received by any of the receiving appliances using the compatible protocol. Such a system and methodology is now possible with the presently described system and methodology."

Thus, Guck merely indicates that it "would be desirable to provide a network where any client, no matter what format his document consists of, or what his personal computer protocol system utilizes, could create, originate or author a document and enable this document's content to be transmitted to and received by personal computer clients or appliances using different types of protocol so as to be received by appliances such as FAX machines, telephones and E-Mail users" the key term used in this context being "**using different types of protocol**."

Guck is clearly referring in this paragraph to "using different types of protocol," **not** to composing a computer message "comprising the steps of: (a) presenting a message composition area for entry of an unformatted into one text field..."

Applicant respectfully point out that such is disclosed **only** in the Applicant's own invention, for example, in instant claim 1, which recites:

> "...comprising the steps of:
>
> (a) presenting a message composition area for entry of an unformatted message into at least one text field and for entry of data into at least one selection field associated with said text field, and a message format selector for selecting an output format from a plurality of formats;"

In fact, the term **unformatted** does not appear at all anywhere in Guck. Accordingly, it is clear the the Final Office Action has erroniously equated the step of **converting the unformatted message to form a formatted message** according to the present invention to Guck's system where **one formatted message** is converted to **another formatted message.**

The contradictory statement in the Final Office Action is clearly seen in the statement that Guck "teaches an author can create its own message or document in his own format such as Rich Text Format (RTF) (unformatted)," which leads to the **illogical** conclusion that "Rich Text Format" is "unformatted."

What Guck discloses is a network providing a server using an object-database that enables an author to create and store an original document, as a source file with **a first format**. Software in the database provides multiple sets of shadow file-converter groups connected to the source file of the original document. Each shadow file-converter set enables the transformation of the original source file format into a **another specific type of format**.

Clearly, it is not a method for composing a computer message which employs the step of **converting an unformatted message to a formatted message** according to the present invention.

Still further, the Final Office Action asserts that Guck discloses creating a message in Rich Text Format (RTF), and that RTF is "unformatted" and "is not a tagging language like TIFF, SGML or HTML." The Final Office Action states that Guck "teaches converting Rich Text format (an untagged format) into TIFF (a tagged format)."

These assertions are flatly contradicted by the disclosure of Guck, which states that RTF is a "a Microsoft standard for encoding formatted text and graphics." Col. 7, lines 1 and 2.

As established above, an RTF message is not an unformatted message. Guck therefore fails to disclose or suggest converting an **unformatted message** to form a formatted message from a text field with format tags.

Mertama discloses a method for implementing electronic mail services. The method parses the structure of electronic mail messages and expresses it to a client as necessary. A terminal sends a server an inquiry about the structure of a selected electronic mail message. The electronic mail message is identified by means of a tag, which unambiguously identifies the message in the mailbox. The terminal analyses the format of the electronic mail message and checks the need for conversion. If conversion is necessary, the server carries out the selected conversion and gives the converted electronic mail message a new identifying tag and stores the message in a mailbox.

Guck and Mertama, either alone or in combination, do not render claim 1 obvious because Guck fails to disclose or suggest the step of presenting a message composition area for entry of an **unformatted message** into a text field.

Mertama fails to remedy the deficiencies of Guck. The Final Office Action indicates that Mertama teaches assigning tags to formatted messages. Mertama does not teach or suggest a composition area for entering an unformatted message, nor does it disclose or suggest converting an unformatted message to form a formatted message. In addition, the tags disclosed in Mertama are identifying tags, not formatting tags. *See*

col. 5, lines 40-43 and 60-61. Therefore, Guck and Mertama, either individually or in combination, fail to render claim 1 obvious.

Claims 10, 15, and 20 through 29 include elements similar to those recited in claim 1. For at least the reasons given above in regard to claim 1, claims 10, 15 and 20 through 29 are patentable over Guck in view of Mertama.

Claims 2-7, 11-14 and 16-19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Guck in view of Mertama and further in view of U.S. Patent No. 6,230,173 to Ferrel, herein after "Farrel".

Claims 2 through 7 depend from independent claim 1, claims 11 through 14 depend from independent claim 10, and claims 16 through 19 depend from independent claim 15.

Ferrel fails to overcome the deficiencies of Guck and Mertama shown herein above as applied to claims 1, 10, 15, and 20-29.

Ferrel discloses a story editor that is able to save files in a Multimedia Document Format (MDF). These multi-media files are then used to provide content for displayed online titles. Ferrel also discloses a method of translating Rich Text Format (RTF) files into MDF files. However, as outlined above, RTF is a standard for encoding **formatted** text and graphics. In other words, Ferrel discloses a method for translating files from one format to another.

Ferrel does not disclose or suggest converting an **unformatted message** to form **a formatted message**.

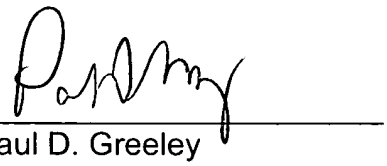
Thus, Mertama and Farrel, either alone or in combination, fail to remedy the deficiencies of Guck.

Accordingly, claims 1, 10, and 15, and by virtue of their dependency, claims 2 through 7, 11 through 14, and 16 through 19 are all patentable over the cited Guck, Mertama, and Ferrel, either individiually or in combination.

In view of the foregoing, Applicant respectfully submits that all claims presented in this application distinguish over the cited references and any combination thereof.

Accordingly, Applicant respectfully requests reconsideration and allowance of all pending claims, namely claims 1-7 and 10-29. An indication of allowance of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully submitted,

Date: January 4, 2007 By: 

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